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FLORENCE T. NAKAKUNI #2286
United States Attorney
District of Hawaii

LESLIE E. OSBORNE, JR. #3740
Assistant U.S. Attorney
Room 6100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, Hawaii 96850
Telephone: (808) 541-2850
Facsimile: (808) 541-2958
E-mail: Les.Osborne@usdoj.gov

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

MAY 24 2012
at 3 o'clock and 31 min
SUE BEITIA, CLERK M.

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID M. ING,

Defendant.

) CR. NO. **CR 12-00517 DAE**
)
) INFORMATION
)
) 29 U.S.C. § 501(c),
) 31 U.S.C. § 5324(a)(3) and
) 31 C.F.R. Part 103
)
)
)

INFORMATION

COUNT 1

The Grand Jury charges that:

1. From on or about January 31, 2011 to on or about December 2, 2011, in the District of Hawaii, the Defendant DAVID M. ING, while an officer, that is treasurer of the National Association of Letter Carriers (NALC), a labor organization engaged in an industry affecting commerce, did embezzle, steal,

and unlawfully and wilfully abstract and convert to his own use the monies, funds and property of said labor organization in the approximate amount of \$83,293.19.

All in violation of Title 29, United States Code, Section 501(c).

COUNT 2

The Grand Jury further charges that:

2. On or about the dates set forth in tabular form below, in the District of Hawaii, the Defendant DAVID M. ING, knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, did cause and attempt to cause a domestic financial institution not to file a report required under Section 5313(a) of Title 31, United States Code, and any regulation prescribed under any such section, as described in the table below.

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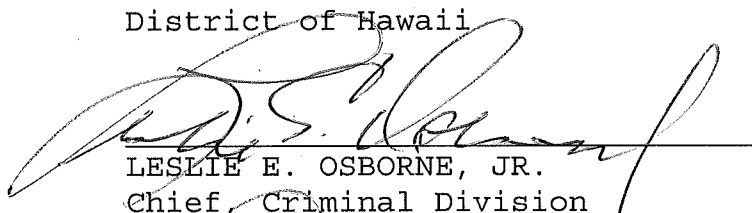
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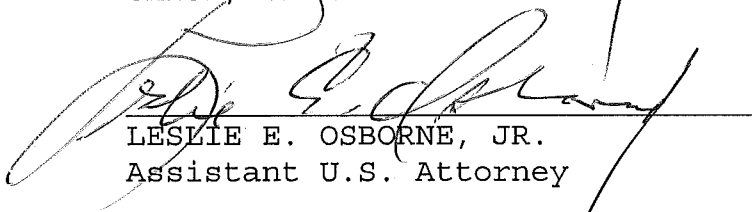
COUNT	DATE	DESCRIPTION
2	11/28/11	Cash withdrawal of \$4,500.00 from Hawaii State Federal Credit Union, Checking Account No. 396858, Pearlridge Branch
	11/29/11	Cash withdrawal of \$5,000.00 from Hawaii State Federal Credit Union, Checking Account No. 396858, Main Branch
	11/30/11	Cash withdrawal of \$3,500.00 from Hawaii State Federal Credit Union, Checking Account No. 396858, Main Branch
	12/02/11	Cash withdrawal of \$4,000.00 from Hawaii State Federal Credit Union, Checking Account No. 396858 (unknown branch)

All in violation of Title 31, United States Code,
Section 5324(a)(3) and Title 31, Code of Federal Regulations,
Part 103.

DATED: Honolulu, Hawaii, May 24, 2012

FLORENCE T. NAKAKUNI
United States Attorney
District of Hawaii


LESLIE E. OSBORNE, JR.
Chief, Criminal Division


LESLIE E. OSBORNE, JR.
Assistant U.S. Attorney

U.S. v. Ing, Cr. No. _____
Information